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September 20, 2024

VIA ECF

Honorable Taryn A. Merkl, U.S.M.J.
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Atakhanova et al. v. Home Family Care, Inc.*, 16-cv-6707 (KAM)(RML)

Dear Judge Merkl:

My firm represents the Plaintiff-class in the above-referenced action. In accordance with Your Honor's August 29, 2024 Order, the parties submit this joint letter to update the Court on the status of the global class-wide settlement that aims to resolve both this matter and the companion case pending in New York State Supreme Court, Kings County. *See Turgunbaev et al. v. Home Family Care, Inc.*, Index. No. 515325/2015 ("*Turgunbaev*").

The parties have been working diligently to finalize the settlement terms and all settlement documents, however, given the complexities of globally resolving two class actions, substantial time has been necessary to ensure all details of the settlement are addressed. Additionally, Defendants' lead counsel is currently on leave. Counsel for the parties are scheduled to meet and confer virtually on Monday, September 23, 2024 to discuss and hopefully finalize all outstanding items. Thereafter, the parties can finalize the remaining settlement documents, and circulate for their respective clients' signatures. Accordingly, the parties respectfully request that they be permitted to provide the Court with a further update, or file a stipulation of dismissal, on or before October 18, 2024.

We thank the Court for its attention to this matter.

Respectfully Submitted,

/s/
LaDonna Lusher, Esq.
Counsel for Plaintiffs

CC: Irene Sinayskaya, Esq. (via ECF)
Nicholas Trotta, Esq. (via ECF)
Steven Yuniver, Esq. (via ECF)